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April 28, 2000

FD2000 Project Coordinator
Food Distribution Division - FNS
3101 Park Center Drive
Ford Avenue Bldg. – Room 601
Alexandria, Virginia 22302

Dear Project Coordinator:

As a state-wide consultant for the School and Community Nutrition Program for the Georgia Department of Education , the following comments are submitted on the February 14, 2000, USDA Proposal for Change.

There was not a great deal of detail about the 16 changes. It appears from reviewing what is contained in each that there are several which, if applied to the current program, would make significant improvement toward the items you identified as "problems" under Section I. The school systems with which I work have not identified these as being problems in Georgia's program. However, USDA Proposal for Change numbers 1 (good concept but don't create storage problem at distributor level with implementation and don't make foods 100% substitutable), 2, 5 , 8 , 9, 10, 11, and the relaxing of truckload restrictions in number 15 appear to be good changes.

However, please do not allow vendors to use commercial labels and to expand full substitutability of commodity product. Accountability and food safety would be big issues and result in new problems for recipient agencies if these two concepts are implemented.

There is too little information on USDA's website and in the proposal for change to comment on the pilots. I strongly feel that prior to beginning the pilots, baseline information/data, expected outcomes, and evaluation methods be established and published.

Will tabulated comment information be available for access so I can see the nature of other comments submitted in response to the proposal for changes? Thank you.

Sincerely,

Janie Bowles

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